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Attorneys for Defendants
UBER TECHNOLOGIES, INC., RASIER, LLC,
and RASIER-CA, LLC

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

This Document Relates to:

Jaylynn Dean v. Uber Techs., Inc.,
No. 23-cv-06708

Case No. 3:23-md-03084-CRB (LJC)

**DECLARATION OF LAURA VARTAIN
HORN IN SUPPORT OF ADMINISTRATIVE
MOTION TO SEAL**

Judge: Hon. Charles R. Breyer
Courtroom: 6 – 17th Floor

1 I, Laura Vartain Horn, declare as follows:

2 1. I am a partner at Kirkland & Ellis LLP, counsel of record for Defendants Uber
3 Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC (collectively, “Uber”). I offer this Declaration in
4 the above-captioned matter in support of Uber’s Administrative Motion to Seal Certain Materials Attached
5 to Uber’s Omnibus Motions in Limine.

6 2. Counsel for Plaintiffs do not oppose Uber’s proposed redactions.

7 3. Attached as **Exhibit A** is Ex. 12 to Uber’s Omnibus Motions In Limine with Uber’s
8 proposed redactions.

9 4. Attached as **Exhibit B** is Ex. 13 to Uber’s Omnibus Motions In Limine with Uber’s
10 proposed redactions.

11 5. Attached as **Exhibit C** is Ex. 14 to Uber’s Omnibus Motions In Limine with Uber’s
12 proposed redactions.

13 6. Attached as **Exhibit D** is Ex. 15 to Uber’s Omnibus Motions In Limine with Uber’s
14 proposed redactions.

15 7. Attached as **Exhibit E** is Ex. 20 to Uber’s Omnibus Motions In Limine with Uber’s
16 proposed redactions.

17 8. Attached as **Exhibit F** is Ex. 23 to Uber’s Omnibus Motions In Limine, which Uber seeks
18 to seal in full.

19 9. Attached as **Exhibit G** is Ex. 24 to Uber’s Omnibus Motions In Limine with Uber’s
20 proposed redactions.

21 10. Attached as **Exhibit H** is Ex. 26 to Uber’s Omnibus Motions In Limine with Uber’s
22 proposed redactions.

23 11. Attached as **Exhibit I** is the JCCP Court’s October 22, 2025 Order on Defendants Uber
24 Technologies Inc. and Rasier LLC’s Motion to Seal Confidential Material Cited in Support of Motion for
25 Summary Judgment or, in the Alternative, Summary Adjudication; Order on Defendants Uber
26 Technologies, Inc. and Rasier, LLC’s Motion to Seal Documents Filed with Opposition to Summary to
27 Motion for Summary Judgment.

1 I declare under penalty of perjury under the laws of the United States of America that the foregoing
2 is true and correct.

3 Dated: December 16, 2025

4 */s/ Laura Vartain Horn*
5 Laura Vartain Horn

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